

EXHIBIT 20

From: Powers, Andrew C[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=AFB7F7C935FE4FB4938203195698DFEA-BDQS]

Sent: Mon 9/9/2019 3:53:49 PM Coordinated Universal Time

To: Tortorich, Troy (TRMT)[TRMT@chevron.com]

Subject: FW: Rescinded Job Offer in Nigeria

FYI.

From: Powers, Andrew C

Sent: Friday, September 6, 2019 7:57 AM

To: Snookal, Mark <Mark.Snookal@chevron.com>

Cc: Tse, Thalia <thaliatse@chevron.com>; Ruppert, Austin <Austin.Ruppert@chevron.com>

Subject: RE: Rescinded Job Offer in Nigeria

Mark,

Thanks for your email and I hear your concerns.

I've reached out to the Medical Department and while I'm not privy to any medical information, I understand a thorough review was conducted and alternatives were explored. We would respectfully disagree that the determination was based on stereotyping or impermissible discrimination.

In terms of next steps, we will ensure you have a position in El Segundo. However, the PDC is also exploring alternative expat and domestic assignments and we should have more information on that soon.

Regards,

Andrew Powers

HR Manager, El Segundo Refinery

Andrew.Powers@chevron.com

This message may contain confidential information and is intended only for the use of the parties to whom it is addressed. If you are not an intended recipient, you are hereby notified that any disclosure, copying, distribution, or use of any information in this message is strictly prohibited. If you have received this message by error, please notify me immediately at the telephone number listed above.

From: Snookal, Mark <Mark.Snookal@chevron.com>

Sent: Wednesday, September 4, 2019 7:21 AM

To: Powers, Andrew C <Andrew.Powers@chevron.com>

Cc: Tse, Thalia <thaliatse@chevron.com>; Ruppert, Austin <Austin.Ruppert@chevron.com>

Subject: Rescinded Job Offer in Nigeria

Andrew,

I am very disappointed in the decision by Chevron Medical to classify me as "unfit" for the Reliability Engineering Manager position at EGTL. I believe this decision was made based on a lack of understanding and stereotypical assumptions about my medical condition and is, therefore, discriminatory in nature. As my condition does not affect my ability to perform the job duties of that position, I require no ongoing care outside of annual monitoring, working in a remote location does not affect my condition, a complication from my condition would cause no harm to others, and I have no work restrictions from my physician this decision seems excessively paternalistic.

After the initial finding of "unfit," I appealed the decision, and Chevron Medical requested permission to contact the specialist who cares for me, and I agreed. That specialist sent an email to Chevron Medical, stating that my condition is stable and has been for three years and that the risk is "low." That same physician had earlier provided me with a letter stating that "it is safe for him [me] to work in Nigeria...His [my] condition is under good control, and no special treatment is needed." Which I provided to Chevron Medical before they made their initial determination of "unfit." Additionally, I passed all aspects of the regular examination, and the issue arises purely from a question about medical history.

Aside from my complaint of medical discrimination, where does their decision leave me? I spoke with the manager I would have reported to in Nigeria this morning, and they are rescinding the offer, but my position in El Segundo has already been filled.

Mark Snookal

IEA Reliability Team Lead

Chevron Products Company

El Segundo Refinery

324 W. El Segundo Blvd.

El Segundo, CA 90245

Tel 310.615.5208

Mobile 310.678.5914

Mark.Snookal@chevron.com

EXHIBIT 21

From: Powers, Andrew <Andrew.Powers@chevron.com>
Sent: Wednesday, September 4, 2019 12:49 PM
To: Tortorich, Troy; Ruppert, Austin
Cc: Tse, Thalia
Subject: RE: Rescinded Job Offer in Nigeria

All – Not for forwarding, but I wanted to give you a quick update. Apologies for the lengthy e-mail as I am traveling.

First, I heard back from medical. They were not able to provide any specific medical information but could state that having a medical condition by itself does not disqualify an individual if the risk can be managed effectively at the host location. In this situation, the host medical team reviewed the case and given the inherent risk and inability to mitigate/eliminate this risk in Escravos, led to the decision of unfit for expat assignment in this case. They did look into whether the position could be moved to Lagos, where there are hospitals and better medical resources but that was not feasible. It is common for the treating physician's decision to be overridden, this happens when the treating provider does not understand the local medical resources at the host location, the difficulty medically evacuating a person from the location, and the risk tolerance of the host, in short disagreements do happen. The use of the term "low risk" is a little misleading here as there is a specific risk of his underlying condition becoming problematic and although the treating doctor reported this individuals risk to be lower than what is written in the medical literature, it's still significant and higher than the business was willing to accept.

Second, I have asked medical how we have responded to these in the past. Mark is not the first person to be deemed unfit for expat assignment. I'd like to get proper and effective language before responding to Mark and let him know who his resources are to further discuss medical details (it is not appropriate if he discusses his condition with you, me or anyone besides medical).

Third, I think you will be best prepared by thinking about what role Mark can do within El Segundo. Do you have an existing vacancy? Do we have any roles that he could be good for in the near future? He mentions a backfill was identified, is that already finalized? I know it would not be ideal, but would you want to consider rescinding that person's offer since Mark's offer fell through? Main intent here is that we need to give Mark the assurance (if possible) that he should not worry about NOT having a job (we will figure something out). It is clear he is frustrated about not getting the expat role, but now is concerned what his employment looks like in general.

I will report back once I hear back from medical on how they have responded to these in the past. In the meantime, if you have any questions that need immediate attention, please feel free to call Thalia or myself.

Kind Regards,

Andrew Powers
HR Manager, El Segundo Refinery
Andrew.Powers@chevron.com

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From: Powers, Andrew C
Sent: Wednesday, September 4, 2019 7:41 AM

To: Tortorich, Troy (TRMT) <TRMT@chevron.com>; Ruppert, Austin <Austin.Ruppert@chevron.com>

Cc: Tse, Thalia <thaliatse@chevron.com>

Subject: Fwd: Rescinded Job Offer in Nigeria

Austin/Troy,

Please be thinking about what role Mark could do if this falls through. Thalia and I will investigate and see what medical can share/set us up with an appropriate response.

Note he finds this discriminatory, however, that is hard to know without further context from medical. I am sure there is a very good reason why this was rescinded.

Andrew

Sent from my iPhone

Begin forwarded message:

From: "Powers, Andrew C" <Andrew.Powers@chevron.com>

Date: September 4, 2019 at 7:35:44 AM PDT

To: "Snookal, Mark" <Mark.Snookal@chevron.com>

Cc: "Tse, Thalia" <thaliatse@chevron.com>, "Ruppert, Austin" <Austin.Ruppert@chevron.com>

Subject: Re: Rescinded Job Offer in Nigeria

Mark,

Thank you for bringing this to our attention. This is the first I am hearing of this. Therefore, please let me look into this and see if I can get a better understanding of why. We will get back to you ASAP.

Andrew

Sent from my iPhone

On Sep 4, 2019, at 7:21 AM, Snookal, Mark <Mark.Snookal@chevron.com> wrote:

Andrew,

I am very disappointed in the decision by Chevron Medical to classify me as "unfit" for the Reliability Engineering Manager position at EGTL. I believe this decision was made based on a lack of understanding and stereotypical assumptions about my medical condition and is, therefore, discriminatory in nature. As my condition does not affect my ability to perform the job duties of that position, I require no ongoing care outside of annual monitoring, working in a remote location does not affect my condition, a complication from my condition would cause no harm to others, and I have no work restrictions from my physician this decision seems excessively paternalistic.

After the initial finding of "unfit," I appealed the decision, and Chevron Medical requested permission to contact the specialist who cares for me, and I agreed. That specialist sent an email to Chevron Medical, stating that my condition is stable and has been for three years and that the risk is "low." That same physician had earlier provided me with a letter stating that "it is safe for him [me] to work in Nigeria...His [my] condition is under good control, and no special treatment is needed." Which I provided to Chevron Medical before they made their initial determination of "unfit." Additionally, I passed all aspects of the regular examination, and the issue arises purely from a question about medical history.

Aside from my complaint of medical discrimination, where does their decision leave me? I spoke with the manager I would have reported to in Nigeria this morning, and they are rescinding the offer, but my position in El Segundo has already been filled.

Mark Snookal
IEA Reliability Team Lead

Chevron Products Company
El Segundo Refinery
324 W. El Segundo Blvd.
El Segundo, CA 90245
Tel 310.615.5208
Mobile 310.678.5914
Mark.Snookal@chevron.com

EXHIBIT 22

From: Powers, Andrew <Andrew.Powers@chevron.com>
Sent: Friday, September 6, 2019 7:57 AM
To: Snookal, Mark
Cc: Tse, Thalia; Ruppert, Austin
Subject: RE: Rescinded Job Offer in Nigeria

Mark,

Thanks for your email and I hear your concerns.

I've reached out to the Medical Department and while I'm not privy to any medical information, I understand a thorough review was conducted and alternatives were explored. We would respectfully disagree that the determination was based on stereotyping or impermissible discrimination.

In terms of next steps, we will ensure you have a position in El Segundo. However, the PDC is also exploring alternative expat and domestic assignments and we should have more information on that soon.

Regards,

Andrew Powers

HR Manager, El Segundo Refinery

Andrew.Powers@chevron.com

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From: Snookal, Mark <Mark.Snookal@chevron.com>
Sent: Wednesday, September 4, 2019 7:21 AM
To: Powers, Andrew C <Andrew.Powers@chevron.com>
Cc: Tse, Thalia <thaliatse@chevron.com>; Ruppert, Austin <Austin.Ruppert@chevron.com>
Subject: Rescinded Job Offer in Nigeria

Andrew,

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is needed.” Which I provided to Chevron Medical before they made their initial determination of “unfit.” Additionally, I passed all aspects of the regular examination, and the issue arises purely from a question about medical history.

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Mark Snookal
IEA Reliability Team Lead

Chevron Products Company

El Segundo Refinery
324 W. El Segundo Blvd.
El Segundo, CA 90245
Tel 310.615.5208
Mobile 310.678.5914
Mark.Snookal@chevron.com

EXHIBIT 23

From: Powers, Andrew C[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=AFB7F7C935FE4FB4938203195698DFEA-BDQS]
Sent: Wed 9/4/2019 2:42:07 PM Coordinated Universal Time
To: Jones MD, Ayanna[Ayanna.Jones@chevron.com]
Cc: Tse, Thalia[thaliatse@chevron.com]; Levy, Scott[ScottLevy@chevron.com]
Subject: Re: Rescinded Job Offer in Nigeria

Thank you Dr. Ayana.
Would be great if we can get some further justification and suggested response today.

Sent from my iPhone

On Sep 4, 2019, at 7:39 AM, Jones MD, Ayanna <Ayanna.Jones@chevron.com> wrote:

Hello Andrew,
The EMEA Regional Medical Manager would be able to provide you with context on this case and appropriate response.
Regards,
Ayanna Jones, MD, MPH
Manager US Occupational and
Expatriate Health Services
Chevron Services Company
A Division of Chevron U.S.A. Inc.
TR & HM COE
Global Health and Medical
1400 Smith, #03196
Houston, TX 77002
Tel: (713)372-5921
Fax: (713)372-5941
Email: Ayanna.Jones@chevron.com

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From: Powers, Andrew C <Andrew.Powers@chevron.com>
Sent: Wednesday, September 04, 2019 9:33 AM
To: Jones MD, Ayanna <Ayanna.Jones@chevron.com>
Cc: Tse, Thalia <thaliatse@chevron.com>
Subject: Fwd: Rescinded Job Offer in Nigeria

Dr. Ayana,
Are you able to provide me with any context on the below and suggested response? Is this common to have conflicting views between someone's personal physician and Chevron Expat Medical?
If there is another resource you would suggest, could I please have their name?
Note that Mark finds this discriminatory in nature, however, this is hard to know with the limited information.
Kind Regards,
Andrew Powers

Sent from my iPhone
Begin forwarded message:

From: "Snookal, Mark" <Mark.Snookal@chevron.com>
Date: September 4, 2019 at 7:20:38 AM PDT
To: "Powers, Andrew C" <Andrew.Powers@chevron.com>
Cc: "Tse, Thalia" <thaliatse@chevron.com>, "Ruppert, Austin" <Austin.Ruppert@chevron.com>
Subject: Rescinded Job Offer in Nigeria

Andrew,
I am very disappointed in the decision by Chevron Medical to classify me as "unfit" for the Reliability Engineering Manager position at ECTL. I believe this decision was made based on a lack of understanding and stereotypical assumptions about my medical condition and is, therefore, discriminatory in nature. As my condition does not affect my ability to perform the job duties of that position, I require no ongoing care outside of annual monitoring, working in a remote location does not affect my condition, a complication from my condition would cause no harm to others, and I have no work restrictions from my physician this decision seems excessively paternalistic.
After the initial finding of "unfit," I appealed the decision, and Chevron Medical requested permission to contact the specialist who cares for me, and I agreed. That specialist sent an email to Chevron Medical, stating that my condition is stable and has been for three years and that the risk is "low." That same physician had earlier provided me with a letter stating that "it is safe for him [me] to work in Nigeria...His [my] condition is under good control, and no special treatment is needed." Which I provided to Chevron Medical before they made their initial determination of "unfit." Additionally, I passed all aspects of the regular examination, and the issue arises purely from a question about medical history.
Aside from my complaint of medical discrimination, where does their decision leave me? I spoke with the manager I would have reported to in Nigeria this morning, and they are rescinding the offer, but my position in El Segundo has already been filled.
Mark Snookal

IEA Reliability Team Lead
Chevron Products Company
El Segundo Refinery
324 W. El Segundo Blvd.
El Segundo, CA 90245
Tel 310.615.5208
Mobile 310.678.5914
Mark.Snookal@chevron.com

EXHIBIT 24

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership
2 Including Professional Corporations
TRACEY A. KENNEDY, Cal Bar No. 150782
3 ROBERT E. MUSSIG, Cal. Bar No. 240369
333 South Hope Street, 43rd Floor
4 Los Angeles, CA 90071-1422
Telephone: 213.620.1780
5 Facsimile: 213.620.1398
E-mail: tkennedy@sheppardmullin.com
6 rmussig@sheppardmullin.com
Attorneys for Defendant.
7 CHEVRON U.S.A. INC.

8
9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION
11

12 MARK SNOOKAL, an individual,
13 Plaintiff,
14 vs.
15 CHEVRON USA, INC., a California
16 Corporation, and DOES 1 through 10,
inclusive,
17 Defendants.
18

Case No. 2:23-cv-6302-HDV-AJR

**DEFENDANT CHEVRON USA, INC.'S
RESPONSES TO PLAINTIFF MARK
SNOOKAL'S SPECIAL
INTERROGATORIES (SET 2)**

Action Filed: August 3, 2023
Trial Date: February 4, 2025

19 PROPOUNDING PARTY: PLAINTIFF, MARK SNOOKAL
20 RESPONDING PARTY: DEFENDANT, CHEVRON USA, INC.
21 SET NO.: TWO
22 NUMBERS: 18-25
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1 and the PDR was Troy Tortorich. With respect to the position of El Segundo
2 Maintenance Change Operating Assistant posted in or around late 2019, the individual
3 overseeing job applications was Emil (“Cotey”) Cswaykus. For each of these
4 individuals, they were involved in reviewing the applications for these positions,
5 interviewing, and assessing the qualifications of each for each position.

6 **SPECIAL INTERROGATORY NO. 20:**

7 IDENTIFY any and all persons who died while on a Chevron Rotational
8 Assignment between January 1, 2017 and January 1, 2022.

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 20:**

10 Defendant hereby incorporates by reference the general objections set forth above.
11 Defendant objects to this Interrogatory to the extent that it seeks information protected
12 from disclosure by the attorney-client privilege and/or the attorney work product
13 doctrine. Defendant objects to this Interrogatory to the extent that it seeks confidential
14 and/or proprietary business information. Defendant objects to this Interrogatory to the
15 extent that it seeks confidential and/or private personnel information of third parties.

16 **SPECIAL INTERROGATORY NO. 21:**

17 For each person IDENTIFIED in YOUR response to Plaintiff’s Interrogatory No.
18 20 above, state the date, cause, location of their death, whether the death occurred on
19 your premises, and whether any wrongful death action was filed.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 21:**

21 Defendant hereby incorporates by reference the general objections set forth above.
22 Defendant objects to this Interrogatory to the extent that it seeks information protected
23 from disclosure by the attorney-client privilege and/or the attorney work product
24 doctrine. Defendant objects to this Interrogatory to the extent that it seeks confidential
25 and/or proprietary business information. Defendant objects to this Interrogatory to the
26 extent that it seeks confidential and/or private personnel information of third parties.

1 **SPECIAL INTERROGATORY NO. 22:**

2 IDENTIFY any and all persons who had to undergo an emergency medical
3 evacuation from a Chevron Rotational Assignment location from January 1, 2017 through
4 January 1, 2022 inclusive.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 22:**

6 Defendant hereby incorporates by reference the general objections set forth above.
7 Defendant objects to this Interrogatory to the extent that it seeks information protected
8 from disclosure by the attorney-client privilege and/or the attorney work product
9 doctrine. Defendant objects to this Interrogatory to the extent that it seeks confidential
10 and/or proprietary business information. Defendant objects to this Interrogatory to the
11 extent that it seeks confidential and/or private personnel and medical information of third
12 parties.

13 **SPECIAL INTERROGATORY NO. 23:**

14 For each person IDENTIFIED in YOUR response to Plaintiff's Interrogatory No.
15 22 above, state the date, cause, and location of their emergency medical evacuation.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 23:**

17 Defendant hereby incorporates by reference the general objections set forth above.
18 Defendant objects to this Interrogatory to the extent that it seeks information protected
19 from disclosure by the attorney-client privilege and/or the attorney work product
20 doctrine. Defendant objects to this Interrogatory to the extent that it seeks confidential
21 and/or proprietary business information. Defendant objects to this Interrogatory to the
22 extent that it seeks confidential and/or private personnel and medical information of third
23 parties.

24 **SPECIAL INTERROGATORY NO. 24:**

25 Describe in detail any and all times when anyone, including rescue personnel, was
26 injured or killed because of an emergency medical evacuation from a Chevron Rotational
27 Assignment between January 1, 2017 and January 1, 2022.
28

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 24:**

2 Defendant hereby incorporates by reference the general objections set forth above.
3 Defendant objects to this Interrogatory to the extent that it seeks information protected
4 from disclosure by the attorney-client privilege and/or the attorney work product
5 doctrine. Defendant objects to this Interrogatory to the extent that it seeks confidential
6 and/or proprietary business information. Defendant objects to this Interrogatory to the
7 extent that it seeks confidential and/or private personnel and medical information of third
8 parties.

9 **SPECIAL INTERROGATORY NO. 25:**

10 IDENTIFY every person who has held a Reliability Engineering Manager position
11 in Escravos, Nigeria from January 1, 2019 to the present, and provide the dates during
12 which they held the position.

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 25:**

14 Defendant hereby incorporates by reference the general objections set forth above.
15 Defendant objects to this Interrogatory to the extent that it seeks information protected
16 from disclosure by the attorney-client privilege and/or the attorney work product
17 doctrine. Defendant objects to this Interrogatory to the extent that it seeks confidential
18 and/or proprietary business information. Defendant objects to this Interrogatory to the
19 extent that it seeks confidential and/or private personnel information of third parties.

20 Subject to and without waiving the foregoing objections, Defendant responds for
21 the time period of Plaintiff's employment, Amir Zaheer and Cesar Malpica. They may be
22 contacted through counsel.

1 Dated: August 13, 2024

2 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

3
4 By /s/Tracey A. Kennedy
5 TRACEY A. KENNEDY
6 ROBERT E. MUSSIG
7 Attorneys for Defendant
8 CHEVRON U.S.A. INC.
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VERIFICATION

I, Harpreet K. Tiwana declare and state:

I am Assistant Secretary of Chevron U.S.A. Inc. ("Chevron"), , a defendant in the action *Mark Snookal v. Chevron U.S.A. Inc.* Case No. 2:23-cv-6302-HDV-AJR filed in the United States District Court for the Central District of California.

I am authorized to sign this verification on behalf of **Chevron**, and I make this verification for that reason.

I have reviewed the foregoing document titled **DEFENDANTS CHEVRON USA. INC.'S RESPONSES TO PLAINTIFF MARK SNOOKAL'S SPECIAL INTERROGATORIES, SET TWO.**

I am informed and believe that the matters stated therein are true and, on that ground verify such matters are true. I do not believe that any one person at **Chevron** knows all of the matters stated therein, and therefore these responses were prepared with the assistance and advice of employees of, and counsel for, **Chevron**, upon whose assistance and advice I have relied. These responses are limited by the records and information still in existence, presently recollected, and thus far discovered in the course of preparation of these responses. **Chevron** reserves the right to change, or supplement said responses, or to apply for relief to permit insertion of unintentionally omitted matter.

I declare under penalty of perjury of the State of California and the United States of America that the foregoing is true and correct.

Executed at San Ramon, California, on August 15, 2024.

Name: Harpreet K. Tiwana

DocuSigned by:

Harpreet K. Tiwana

5093F566A32543B...

Title: Assistant Secretary

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 333 South Hope Street, 43rd Floor, Los Angeles, CA 90071-1422.

On August 13, 2024, I served true copies of the following document(s) described as **DEFENDANT CHEVRON USA, INC.'S RESPONSES TO PLAINTIFF MARK SNOOKAL'S SPECIAL INTERROGATORIES (SET 2)** on the interested parties in this action as follows:

Dolores Y. Leal
Olivia Flechsig
ALLRED, MAROKO & GOLDBERG
6300 Wilshire Blvd. Suite 1500
Los Angeles, CA 90048-5217
dleal@amglaw.com;
oflechsig@amglaw.com

Attorneys for Plaintiff,
MARK SNOOKAL

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address bdelacruz@sheppardmullin.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 13, 2024, at Los Angeles, California.

Beannette De La Cruz

EXHIBIT 25

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership
2 Including Professional Corporations
TRACEY A. KENNEDY, Cal Bar No. 150782
3 ROBERT E. MUSSIG, Cal. Bar No. 240369
H. SARAN FAN, Cal. Bar No. 328282
4 350 South Grand Avenue, 40th Floor
Los Angeles, CA 90071-3460
5 Telephone: 213.620.1780
Facsimile: 213.620.1398
6 E-mail: tkennedy@sheppardmullin.com
rmussig@sheppardmullin.com
7 sfan@sheppardmullin.com

8 Attorneys for Defendant.
CHEVRON U.S.A. INC., a Pennsylvania corporation
9

10
11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION
13

14 MARK SNOOKAL, an individual,
15 Plaintiff,
16 vs.
17 CHEVRON USA, INC., a California
18 Corporation, and DOES 1 through 10,
inclusive,
19 Defendants.
20

Case No. 2:23-cv-6302-HDV-AJR

**DEFENDANTS CHEVRON U.S.A.
INC.'S OBJECTIONS AND
RESPONSES TO PLAINTIFF MARK
SNOOKAL'S INTERROGATORIES,
SET THREE**

Action Filed: August 3, 2023
Trial Date: August 19, 2025

21 PROPOUNDING PARTY: PLAINTIFF MARK SNOOKAL
22 RESPONDING PARTY: DEFENDANT CHEVRON U.S.A. INC.
23 SET NO.: THREE
24 NUMBERS: 26-33
25
26
27
28

2. Defendant objects to each and every Interrogatory to the extent it seeks information that is confidential, proprietary, or a business or trade secret.

3. Defendant objects to each and every Interrogatory to the extent it seeks information pertaining to a non-party that is protected from disclosure by, among other things, the California Constitution's right of privacy and other privacy privileges.

4. In responding to the following Interrogatories, Defendant does not concede the relevance or materiality of any such area of inquiry to the subject matter of this litigation.

5. Inadvertent disclosure of privileged information by Defendant shall not constitute a waiver of any applicable privilege or doctrine, including but not limited to objections on the basis of competency, confidentiality, relevancy, materiality, privilege and/or admissibility of evidence as such objections may apply at trial or otherwise in this action.

6. Defendant objects to each and every Interrogatory to the extent it is overbroad and unduly burdensome, and seeks information that is neither relevant, proportional to the needs of the case, nor reasonably calculated to lead to the discovery of admissible evidence, including, without limitation, on the grounds that an Interrogatory lacks reasonable date or time parameters.

7. Defendant objects to each and every Interrogatory to the extent it is vague, ambiguous, and/or unintelligible.

8. Defendant objects to each and every Interrogatory to the extent the requested information is available from other sources and/or from other means.

Each of the foregoing general objections is hereby incorporated by reference into each specific objection to each Interrogatory as if separately stated therein.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 26:

Describe in detail the business relationship between YOU and Chevron Nigeria Ltd. during the 2018 to 2020 time period.

RESPONSE TO INTERROGATORY NO. 26:

Defendant hereby incorporates by reference the general objections set forth above. Defendant objects to this Interrogatory on the grounds that it calls for a legal conclusion. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or proprietary business information. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or private personnel information of third parties.

Subject to and without waiving the foregoing objections, and limiting its response to the time period relevant to Plaintiff's Complaint, Defendant responds as follows: Defendant and Chevron Nigeria Limited are independent legal entities and affiliates under Chevron Corporation, a Delaware corporation.

INTERROGATORY NO. 27:

Describe in detail the business relationship between Chevron Nigeria Ltd. and Chevron Hospital in Warri, Nigeria during the 2018 to 2020 time period.

RESPONSE TO INTERROGATORY NO. 27:

Defendant hereby incorporates by reference the general objections set forth above. Defendant objects to this Interrogatory on the grounds that it seeks information that is not relevant to any party's claim or defense nor proportional to the needs of the case. Defendant objects to this Interrogatory on the grounds that it calls for a legal conclusion. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or proprietary business information. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or private personnel information of third parties.

INTERROGATORY NO. 28:

Describe in detail the business relationship between Chevron Nigeria Ltd. and the Escravos Joint Venture Clinic in Escravos, Nigeria during the 2018 to 2020 time period.

RESPONSE TO INTERROGATORY NO. 28:

Defendant hereby incorporates by reference the general objections set forth above. Defendant objects to this Interrogatory on the grounds that it seeks information that is not relevant to any party's claim or defense nor proportional to the needs of the case.

1 **INTERROGATORY NO. 33:**

2 IDENTIFY the business entity or entities which compensate employees while on
3 rotational expatriate assignment in Nigeria.

4 **RESPONSE TO INTERROGATORY NO. 33:**

5 Defendant hereby incorporates by reference the general objections set forth above.
6 Defendant objects to this Interrogatory on the grounds that it is vague and ambiguous,
7 including as to time and scope and as to the term “compensate.” Defendant objects to
8 this Interrogatory on the grounds that it calls for a legal conclusion. Defendant objects to
9 this Interrogatory to the extent that it seeks confidential and/or proprietary business
10 information. Defendant objects to this Interrogatory to the extent that it seeks
11 confidential and/or private personnel information of third parties.

12 Subject to and without waiving the foregoing objections, based upon its
13 understanding of this Interrogatory, and limiting its response to the time period and
14 allegations relevant to Plaintiff’s Complaint, Defendant responds as follows: In July
15 2019, Defendant provided payroll services for its employees who assumed the REM
16 expatriate rotational assignment with Chevron Nigeria Limited in Escravos, Nigeria, and
17 the employee’s compensation was charged by Defendant to Chevron Nigeria Limited,
18 who was the employer of the REM position.

19 Dated: February 25, 2025

20 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
21

22 By /s/ Sarah Fan

23 TRACEY A. KENNEDY
24 ROBERT E. MUSSIG
25 SARAH FAN

26 Attorneys for Defendant
27 CHEVRON U.S.A. INC. a Pennsylvania corporation
28

1 **VERIFICATION**

2 I, Harpreet K. Tiwana declare and state:

3 I am an Assistant Secretary of Chevron U.S.A. Inc. ("Chevron"), a defendant in the
4 action *Mark Snookal v. Chevron U.S.A. Inc.* Case No. 2:23-cv-6302-HDV-AJR filed in
5 the United States District Court for the Central District of California.

6 I am authorized to sign this verification on behalf of **Chevron**, and I make this
7 verification for that reason.

8 I have reviewed the foregoing document titled **DEFENDANTS CHEVRON**
9 **U.S.A. INC.'S RESPONSES TO PLAINTIFF MARK SNOOKAL'S**
10 **INTERROGATORIES (SET THREE).**

11 I am informed and believe that the matters stated therein are true and, on that
12 ground verify such matters are true. I do not believe that any one person at **Chevron**
13 knows all of the matters stated therein, and therefore these responses were prepared with
14 the assistance and advice of employees of, and counsel for, **Chevron**, upon whose
15 assistance and advice I have relied. These responses are limited by the records and
16 information still in existence, presently recollected, and thus far discovered in the course
17 of preparation of these responses. **Chevron** reserves the right to change, or supplement
18 said responses, or to apply for relief to permit insertion of unintentionally omitted matter.

19 I declare under penalty of perjury of the State of California and the United States
20 of America that the foregoing is true and correct.

21 Executed at San Ramon, California, on February 25, 2025.

22 DocuSigned by:

23 *Harpreet K. Tiwana*

24 5093F566A32543B...

25 Name: Harpreet K. Tiwana

26 Title: Assistant Secretary
27
28

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of San Diego, State of California. My business address is 350 South Grand Avenue, 40th Floor, Los Angeles, CA 90071-3460.

On February 25, 2025, I served true copies of the following document(s) described as **DEFENDANTS CHEVRON USA, INC.'S OBJECTIONS AND RESPONSES TO PLAINTIFF MARK SNOOKAL'S INTERROGATORIES (SET THREE)** on the interested parties in this action as follows:

Dolores Y. Leal Olivia Flechsig ALLRED, MAROKO & GOLDBERG 6300 Wilshire Blvd. Suite 1500 Los Angeles, CA 90048-5217 dleal@amglaw.com oflechsig@amglaw.com jpena@amglaw.com apaz@amglaw.com	Attorneys for Plaintiff MARK SNOOKAL
--	---

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address sfan@sheppardmullin.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on February 25, 2025, at Culver City, California.

/s/ Sarah Fan

Sarah Fan

EXHIBIT 26

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership
2 Including Professional Corporations
TRACEY A. KENNEDY, Cal Bar No. 150782
3 ROBERT E. MUSSIG, Cal. Bar No. 240369
H. SARAN FAN, Cal. Bar No. 328282
4 350 South Grand Avenue, 40th Floor
Los Angeles, CA 90071-3460
5 Telephone: 213.620.1780
Facsimile: 213.620.1398
6 E-mail: tkennedy@sheppardmullin.com
rmussig@sheppardmullin.com
7 sfan@sheppardmullin.com

8 Attorneys for Defendant.
CHEVRON U.S.A. INC., a Pennsylvania corporation
9

10
11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION
13

14 MARK SNOOKAL, an individual,
15 Plaintiff,
16 vs.
17 CHEVRON USA, INC., a California
18 Corporation, and DOES 1 through 10,
inclusive,
19 Defendants.
20

Case No. 2:23-cv-6302-HDV-AJR

**DEFENDANTS CHEVRON U.S.A.
INC.'S OBJECTIONS AND
RESPONSES TO PLAINTIFF MARK
SNOOKAL'S INTERROGATORIES,
SET THREE**

Action Filed: August 3, 2023
Trial Date: August 19, 2025

21 PROPOUNDING PARTY: PLAINTIFF MARK SNOOKAL
22 RESPONDING PARTY: DEFENDANT CHEVRON U.S.A. INC.
23 SET NO.: THREE
24 NUMBERS: 26-33
25
26
27
28

1 **INTERROGATORY NO. 33:**

2 IDENTIFY the business entity or entities which compensate employees while on
3 rotational expatriate assignment in Nigeria.

4 **RESPONSE TO INTERROGATORY NO. 33:**

5 Defendant hereby incorporates by reference the general objections set forth above.
6 Defendant objects to this Interrogatory on the grounds that it is vague and ambiguous,
7 including as to time and scope and as to the term “compensate.” Defendant objects to
8 this Interrogatory on the grounds that it calls for a legal conclusion. Defendant objects to
9 this Interrogatory to the extent that it seeks confidential and/or proprietary business
10 information. Defendant objects to this Interrogatory to the extent that it seeks
11 confidential and/or private personnel information of third parties.

12 Subject to and without waiving the foregoing objections, based upon its
13 understanding of this Interrogatory, and limiting its response to the time period and
14 allegations relevant to Plaintiff’s Complaint, Defendant responds as follows: In July
15 2019, Defendant provided payroll services for its employees who assumed the REM
16 expatriate rotational assignment with Chevron Nigeria Limited in Escravos, Nigeria, and
17 the employee’s compensation was charged by Defendant to Chevron Nigeria Limited,
18 who was the employer of the REM position.

19 Dated: February 25, 2025

20 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
21

22 By /s/ Sarah Fan

23 TRACEY A. KENNEDY
24 ROBERT E. MUSSIG
25 SARAH FAN

26 Attorneys for Defendant
27 CHEVRON U.S.A. INC. a Pennsylvania corporation
28

1 **VERIFICATION**

2 I, Harpreet K. Tiwana declare and state:

3 I am an Assistant Secretary of Chevron U.S.A. Inc. ("Chevron"), a defendant in the
4 action *Mark Snookal v. Chevron U.S.A. Inc.* Case No. 2:23-cv-6302-HDV-AJR filed in
5 the United States District Court for the Central District of California.

6 I am authorized to sign this verification on behalf of **Chevron**, and I make this
7 verification for that reason.

8 I have reviewed the foregoing document titled **DEFENDANTS CHEVRON**
9 **U.S.A. INC.'S RESPONSES TO PLAINTIFF MARK SNOOKAL'S**
10 **INTERROGATORIES (SET THREE).**

11 I am informed and believe that the matters stated therein are true and, on that
12 ground verify such matters are true. I do not believe that any one person at **Chevron**
13 knows all of the matters stated therein, and therefore these responses were prepared with
14 the assistance and advice of employees of, and counsel for, **Chevron**, upon whose
15 assistance and advice I have relied. These responses are limited by the records and
16 information still in existence, presently recollected, and thus far discovered in the course
17 of preparation of these responses. **Chevron** reserves the right to change, or supplement
18 said responses, or to apply for relief to permit insertion of unintentionally omitted matter.

19 I declare under penalty of perjury of the State of California and the United States
20 of America that the foregoing is true and correct.

21 Executed at San Ramon, California, on February 25, 2025.

22 DocuSigned by:

23 *Harpreet K. Tiwana*

24 5093F566A32543B...

25 Name: Harpreet K. Tiwana

26 Title: Assistant Secretary
27
28

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of San Diego, State of California. My business address is 350 South Grand Avenue, 40th Floor, Los Angeles, CA 90071-3460.

On February 25, 2025, I served true copies of the following document(s) described as **DEFENDANTS CHEVRON USA, INC.'S OBJECTIONS AND RESPONSES TO PLAINTIFF MARK SNOOKAL'S INTERROGATORIES (SET THREE)** on the interested parties in this action as follows:

Dolores Y. Leal Olivia Flechsig ALLRED, MAROKO & GOLDBERG 6300 Wilshire Blvd. Suite 1500 Los Angeles, CA 90048-5217 dleal@amglaw.com oflechsig@amglaw.com jpena@amglaw.com apaz@amglaw.com	Attorneys for Plaintiff MARK SNOOKAL
--	---

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address sfan@sheppardmullin.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on February 25, 2025, at Culver City, California.

/s/ Sarah Fan

Sarah Fan

EXHIBIT 27

From: Asekomeh, Eshiofe [DELOG][mailto:EAEV@chevron.com]
Sent: Thur 8/15/2019 10:13:10 AM Coordinated Universal Time
To: Pitan, Olorunfemi (femi.pitan)[mailto:femi.pitan@chevron.com]
Subject: RE: MSEA Case - Snookal, Mark

Good morning Ma,

Thanks for the feedback. I complete the clearance today.

Warm regards,

Eshiofe Asekomeh

From: Pitan, Olorunfemi (femi.pitan) <femi.pitan@chevron.com>
Sent: Thursday, August 15, 2019 9:24 AM
To: Asekomeh, Eshiofe [DELOG] <EAEV@chevron.com>
Cc: Arenyeka, Paul O. (PaulArenyeka) <PaulArenyeka@chevron.com>
Subject: FW: MSEA Case - Snookal, Mark

Dear Dr Asekomeh,

Thanks for the excellent work you put into this case. Please view e mail.

- Kindly decline a job transfer to Escravos.
- You can indicate that he will be cleared for an assignment in Lagos if that is the direction the U.S. decides to pursue.

Best regards,
Femi Pitan

Dr O.C. Pitan

OH Physician/ Head, Occupational Health
Nigeria Mid Africa Strategic Business Unit

✉ femi.pitan@Chevron.com

☎ CTN 2772222 ext 61807

☎ International [REDACTED]

NMA HR: Focus, Process Excellence, Expertise

This message may contain confidential information and is intended only for the use of the parties to whom it is addressed. If you are not an intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any information in this message is strictly prohibited. If you have received this message in error, please notify me immediately at the telephone number indicated above

From: Frangos MD, Steve (SAFR) <SAFR@chevron.com>
Sent: Thursday, August 8, 2019 10:07 PM
To: Arenyeka, Paul O. (PaulArenyeka) <PaulArenyeka@chevron.com>; Levy, Scott <ScottLevy@chevron.com>; Pitan, Olorunfemi (femi.pitan) <femi.pitan@chevron.com>
Subject: FW: MSEA Case - Snookal, Mark

Hi Paul. Thanks for the opportunity to review this case.

In the case of medical transfers to Escravos, my view is that NMA Occupational Health and NMA Cardiologists get 9/10 of the opinions.

As is pointed out, the patient is low risk for a major adverse CV event. Yet in Escravos, there are only limited resources for initial stabilization and transfer of a major adverse CV event. There is health risk in an Escravos assignment.

This individual would likely be fit for expatriate assignment in Lagos.

Happy to discuss further if needed.

Stephen Frangos, MD, MPH, FACOEM
Regional Manager, Health and Medical – Americas
TR & HM COE
safr@chevron.com
Chevron Services Company
A Division of Chevron U.S.A. Inc.
Global Health and Medical
1400 Smith, Room 03016
Houston, Texas 77002
Tel +1 713 372 5922
Fax +1 713 372 5941
Mobile [REDACTED]

Chevron Malaria Hotline for any questions about symptoms or treatment- +1 866 276 5118

This message may contain confidential information and is intended only for the use of parties to whom it is addressed. If you are not an intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any information in this message is strictly prohibited. If you have received this message in error, please notify me immediately at (713) 372-5922 or by reply e-mail.

From: Arenyeka, Paul O. (PaulArenyeka) <PaulArenyeka@chevron.com>
Sent: Thursday, August 08, 2019 12:43 PM
To: Frangos MD, Steve (SAFR) <SAFR@chevron.com>; Levy, Scott <ScottLevy@chevron.com>
Cc: Pitan, Olorunfemi (femi.pitan) <femi.pitan@chevron.com>
Subject: FW: MSEA Case - Snookal, Mark

Hello Steve and Scott

Top of the day to you

Kindly find attached and below the details of an expatriate employee Mark Snookal, who is being evaluated for a transfer from El Segundo, USA to Escravos, Nigeria.

My concerns are on the safety of such an employee with a potential cardiac abnormality though of low risk being transferred to remote location in the field where access to expert cardiac management and equipment may not be readily available or subject to logistic challenge.

I would greatly value your kind opinions and thoughts on this.

Best Regards

Paul Arenyeka MD

Medical Director
Nigeria Mid Africa SBU
✉ poar@chevron.com
☎ CTN 2772222 ext 67046
☎ International [REDACTED]

NMA HR: Focus, Process Excellence, Expertise

This message may contain confidential information and is intended only for the use of the parties to whom it is addressed. If you are not an intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any information in this message is strictly prohibited. If you have received this message in error, please notify me immediately at the telephone number indicated above

From: Pitan, Olorunfemi (femi.pitan) <femi.pitan@chevron.com>
Sent: Thursday, August 8, 2019 2:08 PM
To: Arenyeka, Paul O. (PaulArenyeka) <PaulArenyeka@chevron.com>
Subject: MSEA Case - Snookal, Mark

Good day sir,

As discussed, please find attached the following documents pertaining to Mark Snookal, who is being evaluated for a transfer from El Segundo, USA to Escravos, Nigeria.
The position is Reliability Engineering Manager.

Documents attached:

- Cardiology clearance (of July 29, 2019). Cleared to work in Nigeria but not Escravos specifically
- Report of Cardiac CTA (computed tomography angiogram) and Echo
- Medical Summary by Dr Asekomeh
- Summary of opinions from NMA Cardiologists – **for your own perusal.**

Kind regards,
Femi Pitan

Dr O.C. Pitan
OH Physician/ Head, Occupational Health
Nigeria Mid Africa Strategic Business Unit
✉ femi.pitan@Chevron.com
☎ CTN 2772222 ext 61807
☎ International [REDACTED]

NMA HR: Focus, Process Excellence, Expertise

This message may contain confidential information and is intended only for the use of the parties to whom it is addressed. If you are not an intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any information in this message is strictly prohibited. If you have received this message in error, please notify me immediately at the telephone number indicated above

From: Asekomeh, Eshiofe [DELOG] <FAEV@chevron.com>
Sent: Wednesday, August 7, 2019 1:31 PM
To: Pitan, Olorunfemi (femi.pitan) <femi.pitan@chevron.com>
Subject: Medical summary - Snookal, Mark

Good day Ma,

Please find attached, medical summary for above named employee as requested.
Also attached, are the recent Cardiologist clearance and the CTA/ Echo reports from April.

Warm regards,

Eshiofe Asekomeh

Dr. Asekomeh E.G
Chevron Hospital
Warri, Nigeria

EXHIBIT 28

Escravos Medevac Records for 2017 - 2022				
2017				
S/N	Date of incident	Diagnosis	Remarks	
1	1/2/2017	Acute coronary syndrome	Sudden onset chest pain with palpitations. Elevated cardiac abnormalities.	
2	1/7/2017	Spondylotic radiculopathy	Acute sciatica resulting in severe pain and inability to sit	
3	1/9/2017	Bleeding Haemorrhoid		
4	1/10/2017	Hypertensive Encephalopathy	Sudden collapse and confusion with highly elevated blood p	
5	1/15/2017	Seizure disorder	Alteration in level of consciousness and tonic features	
6	1/29/2017	Appendicitis		
7	1/30/2017	severe sciatica (?slipped disc)	Severe back pain, unable to walk	
8	2/19/2017	Seizure disorder	Was admitted for post seizure confusion and had more seizu	
9	4/4/2017	Uncontrol Hypertension and Diabetes		
10	5/1/2017	severe migraine headache		
11	7/5/2017	Cerebrovascular accident (CVA)		
12	7/7/2017	Traumatic Injury (Rt. Foot)- Fracture		
13	7/17/2017	Cerbvascular disease		
14	7/22/2017	Hand and foot injury- burns	Burn injury from diesel fire	
15	7/22/2017	Hand and foot injury- burns	Hand and leg burns from diesel fire	
16	8/1/2017	Severe burns	Fire	
17	8/1/2017	Severe burns	Fire	
18	8/14/2017	Traumatic amputation of left middle finger		
19	9/19/2017	Traumatic contusional injury of left ankle and deep lacerations	Other IOC personnel	
20	9/19/2017	Severe injury	Other IOC personnel	
21	10/2/2017	Fire Injury/ burns	Boat fire	
Total		21		
2018				
S/N		Diagnosis	Remarks	
1	3/3/2018	Cerebrovascular accident (CVA)	Right hemiparesis and associated dysphasia	
2	3/14/2018	Acute urinary retention		
3	3/29/2018	Acute coronary syndrome		
4	4/21/2018	Cerebrovascrular accident	Right hemispheric ischeamic CVA, medevac from a vessel	
5	5/9/2018	Severe Burns	From steam	
6	5/11/2018	Congestive cardiac failure		
7	6/21/2018	Cerebrovascular accident (CVA)	Found unconscious in his room	
8	7/23/2018	Seizure disorder		
9	8/10/2018	Acute coronary syndrome		

EXHIBIT 28-1

		10	8/14/2018	Non-STEMI Acute coronary syndrome	
		11	9/18/2018	Hand Injury	Amputated index finger of the right hand
		12	8/19/2018	Acute Appendicitis	
		13	8/19/2018	Acute urinary retention	
		14	8/19/2018	Multiple organ failure (Heart/renal)	
		15	8/24/2018	Cerebrovascular accident (CVA)	Slurred speech and left limb weakness
		16	10/4/2018	Severe Sepsis	Fever with chills and chest infection
		17	11/16/2018	Acute pulmonary oedema	
		18	12/3/2018	Acute Upper GI bleeding	Hypotension and hypoglycaemia and upper GI bleeding
		19	12/4/2018	Acute Appendicitis	
		20	12/8/2018	Seizure disorder	History of recent fall with head trauma while at home
		Total			20
		2019			
		S/N		Diagnosis	Remarks
		1	1/5/2019	Transient ischaemic attack (TIA)	Transient inability to walk and slurred speech. Also had supraventricular tachycardia
		2	1/11/2019	Cerebrovascular accident	
		3	1/14/2019	Injury from motor vehicular accident (MVA)	
		4	2/11/2019	Near drowning	
		5	2/23/2019	Severe hypertension in RVD patient	
		6	3/11/2019	Acute Hyperglycaemic crisis in DM	
		7	3/26/2019	Cerebrovascular accident	Slurred speech with right limb weakness
		8	3/28/2019	Severe Bleeding Haemorrhoid	
		9	3/31/2019	Cerebrovascular accident	
		10	4/22/2019	Severe Burns	
		11	5/9/2019	Burns	
		12	5/9/2019	Cerebrovascular accident	
		13	5/21/2019	Traumatic brain injury with Irrational behaviour	Developed symptoms hours after he fell into the sea.
		14	6/6/2019	Head trauma	Resulted in headache and dizziness
		15	6/7/2019	Acute Febrile Illness	
		16	6/28/2019	Severe Sciatica	
		17	7/30/2019	Hypertensive encephalopathy	
		18	8/11/2019	Pulmonary embolism	
		19	8/12/2019	Pulmonary oedema	
		20	8/19/2019	Cerebrovascular accident	Haemorrhagic stroke with altered consciousness
		21	8/21/2019	Panic attack	
		22	9/10/2019	Appendicitis	
		23	9/10/2019	Appendicitis	
		24	9/17/2019	Traumatic Chest Injury	Chest trauma with fracture of the left 8th rib
		25	10/4/2019	Psychosis	Irrational behaviour and hallucination
		26	10/22/2019	Renal stone	Severe flank pain/ known hypertensive
		27	10/7/2019	Cerebrovascular accident	
		28	10/8/2019	Cycling accident – traumatic leg injury	

EXHIBIT 28-2

		29	10/19/2019	Severe lumbargo	
		30	11/20/2019	Acute Appendicitis	
		31	12/3/2019	Hypertensive encephalopathy	
		Total			31
		2020			
		S/N		Diagnosis	Remarks
		1	1/26/2020	Hypertensive Encephalopathy	Sudden collapse and severely elevated blood pressure
		2	1/27/2020	Myocardial infarction	Acute Chest pain in a known hypertensive
		3	2/24/2020	Wax burn	
		4	2/28/2020	Cerebrovascular accident	Collapse with weakness of limbs and inability to move
		5	3/14/2020	Burns from explosion	
		6	3/17/2020	Upper Gastrointestinal bleeding	
		7	3/23/2020	Abnormal behaviour/ Mood disorder	
		8	4/17/2020	Acute urinary retention	
		9	4/21/2020	Cerebrovascular accident	Left limb weakness
		10	5/11/2020	Cerebrovascular accident	Collapse with limb weakness
		11	5/13/2020	Severe hypertension	
		12	5/12/2020	Seizure disorder	
		13	5/13/2020	Hypertensive crisis	
		14	11/8/2020	Traumatic injury from accident	Traumatic left ring finger tip amputation and crush injury of other f
		15	11/8/2020	Traumatic brain injury	Boat collision with platform boat landing
		16	11/23/2020	Acute appendicitis	
		17	6/10/2020	Severe Sepsis	
		Total			17
		2021			
		S/N		Diagnosis	Remarks
		1	2/26/2021	Hypovolemic Shock from Gastroenteritis	
		2	3/19/2021	Intestinal Obstruction	
		3	3/30/2021	Ischemic Heart Disease	ECG showed atrial flutter and evidence of old ischeamic heart cha
		4	5/14/2021	Traumatic Knee Dislocation	
		5	5/20/2021	Cholecystitis	
		6	5/5/2021	Appendicitis	
		7	6/6/2021	Acute Coronary Syndrome	Sudden onset chest pain and breathlessness
		8	5/26/2021	Severe Malaria	
		9	6/13/2021	Sepsis	
		10	6/26/2021	Rt Forearm Fracture	
		11	7/17/2021	Seizure disorder	Generalised new onset tonic-clonic seizure
		12	8/5/2021	Seizure disorder	Epileptic. Disorientation after seizures

EXHIBIT 28-3

		13	8/26/2021	Hypotension In Cyesis	
		14	9/27/2021	Acute Appendicitis	
		15	11/1/2021	Near Drowning	
		16	9/28/2021	Acute Confusional State	
		17	9/29/2021	Peri Anal abscess	
		18	10/14/2021	Septic Shock	
		19	12/26/2021	Traumatic Injury -Accident	
		Total			19
		2022			
		S/N		Diagnosis	Remarks
		1	2/21/2022	Acute appendicitis	
		2	2/21/2022	Acute appendicitis	
		3	3/28/2022	Acute coronary syndrome	
		4	3/30/2022	Acute appendicitis	
		5	4/4/2022	Appendicitis	
		6	4/5/2022	Urolithiasis	
		7	5/14/2022	Deep Vein Thrombosis (DVT)	
		8	5/15/2022	Burns	Fire
		9	5/19/2022	Deep Vein Thrombosis and pulmonary embolism	
		10	5/24/2022	Traumatic head injury with Mutiple lacerations	
		11	6/10/2022	Severe multiple injuries	Legs trapped between boat and platform boat landing
		12	7/27/2022	Severe Malaria and sepsis	
		13	8/25/2022	Severe injuries	
		14	9/30/2022	Diabetes & Hypotension	
		15	10/28/2022	Major head trauma	From sea pirate attack
		16	10/28/2022	Facial trauma	From sea pirate attack
		17	10/28/2022	Partial intestinal obstruction	
		18	11/3/2022	Vaso-occlusive Crisis In A Known HBSS genotype	
		19	11/18/2022	Major burns	27% burns from hot engine oil in tanker vessel pipe rupture
		20	11/18/2022	Abnormal behaviour/ Delusions (Schizophrenia)	
		Total			20

EXHIBIT 28-4

Escravos Fatalities 2017-2022

Year	# of Incidents	Date	Incident Details
2017	1	January 17, 2017	Contractor personnel was found unresponsive in his accommodation. The site m commenced Cardiopulmonary Resuscitation (“CPR”). The CPR was unsuccessful.
2018	4	January 07, 2018	Medical team was called to the case of a contractor personnel who slumped along accommodation block in Escravos. He was moved to the clinic. CPR was unsuccessful.
		October 17, 2018	Employee collapsed while walking back to his office from lunch. CPR was commenced and continued until Escravos medical personnel arrived the scene and transported him to the clinic. CPR made at resuscitation were not successful.
		July 22, 2018	Contractor personnel was observed conscious but unresponsive while in bed at accommodation. He was taken to the clinic where he was stabilized until the following morning when flight medevac. He was medevaced to his company arranged clinic in Warri. He later died on July 23, 2018.
		August 10, 2018	At approximately 1300hrs, a contractor personnel was observed to be unwell in his accommodation. He was transferred to the on-site clinic. Her condition deteriorated during the evening and he died. CPR was unsuccessful.
2019	4	April 8, 2019	At approximately 1600 hours, a Captain slumped on the accommodation deck of the vessel. He was on standby at a CNL facility. He was immediately transferred to the nearby clinic where CPR was performed without success.
		May 22, 2019	At approximately 0500 hrs, a contractor personnel was found unconscious and slumped in his roommates in his Escravos accommodation. The Medical Response team was notified and CPR was commenced. He was later medevaced to Warri at 0755 hours and transferred to the clinic where he died at approximately 1215 hrs
		August 11, 2019	At approximately 1300hrs, a contractor personnel on a Self Elevating Work Overhead Crane was in the toilet and momentarily lost consciousness. He was medevaced to the Escravos clinic where he was stabilised and later transferred to his company clinic. He died on August 14, 2019.
		October 16, 2019	At about 3:20pm, a contractor personnel slumped at a on a Well Platform. All efforts to revive him were unsuccessful.

EXHIBIT 28-5

Escravos Fatalities 2017-2022

2020	2	December 18, 2020	At about 23:15hrs, a security personnel was discovered unresponsive on an Oil found no sign of life and he was confirmed dead.
		October 12, 2020	A Contractor personnel discovered he had a highly elevated blood pressure on s became unresponsive while being assessed by the facility Nurse. Resuscitation
2021	3	May 13, 2021	A Contractor personnel reported at the medical post at about 23:30 hours with a commenced, however the condition deteriorated rapidly and efforts at resuscitation 2021.
		July 27, 2021	An employee was medevaced from Escravos to Chevron Hospital Warri with a He subsequently tested positive for Coronavirus Disease (COVID-19) and was pneumonia. However, his condition continued to deteriorate until he passed on
		November 9, 2021	A contractor personnell was brought into the Escravos Clinic at 0530hrs from h chest tightness and breathlessness. He was unresponsive on arrival at the Escrav were unsuccessful.
2022	7	January 17, 2022,	At about 0610 hours, contractor personnel was found unconscious by his roomn attached to a Well Platform. He was immediately moved to the nearest medical him and commenced CPR which was unsuccessful.
		August 17, 2022	At about 0850 hours, a contractor personnel l slumped while at the mess hall on were unsuccessful.
		September 11, 2022	At about 1030hrs, a contractor personnel had seizures while off-duty an making a phone call. He became unconscious and resuscitation efforts v

EXHIBIT 28-6

Escravos Fatalities 2017-2022

		September 10, 2022	At about 1020 hrs, a contractor personnel developed breathing difficulties on a nearby medical post for further medical attention. He subsequently had a cardio and resuscitation was not successful.
		September 2, 2022	At about 1800 hours, a contractor personnel on a Self Elevating Workover Platform lost consciousness while mustering with other crew members Resuscitation efforts were unsuccessful.
		September 5, 2022,	At about 2250 hours, a contractor personnel was retrieved from his room following a medical assessment. He was found in the bathroom. He subsequently had a cardiac arrest. CPR was performed but he was not revived.
		December 24, 2022	At about 08:10hrs, a contractor personnel was found unrousable in his room by a medical team. Assessment by the medical team noted that rigor mortis had set in and no need for resuscitation. He was confirmed dead.

EXHIBIT 28-7

EXHIBIT 29

From: Levy, Scott[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EF6C6DC5AA0B407FA6A60ED694E3A3D1-LTMV]
Sent: Wed 9/4/2019 5:42:22 PM (UTC)
To: Jones MD, Ayanna[Ayanna.Jones@chevron.com]
Subject: Re: Rescinded Job Offer in Nigeria

Thanks. I got this.

Sent from my iPad

On Sep 4, 2019, at 3:39 PM, Jones MD, Ayanna <Ayanna.Jones@chevron.com> wrote:

Hello Andrew,

The EEMEA Regional Medical Manager would be able to provide you with context on this case and appropriate response.

Regards,

Ayanna Jones, MD, MPH
Manager US Occupational and
Expatriate Health Services

Chevron Services Company
A Division of Chevron U.S.A. Inc.
TR & HM COE
Global Health and Medical
1400 Smith, #03196
Houston, TX 77002
Tel: (713)372-5921
Fax: (713)372-5941
Email: Ayanna.Jones@chevron.com

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From: Powers, Andrew C <Andrew.Powers@chevron.com>
Sent: Wednesday, September 04, 2019 9:33 AM
To: Jones MD, Ayanna <Ayanna.Jones@chevron.com>
Cc: Tse, Thalia <thaliatse@chevron.com>
Subject: Fwd: Rescinded Job Offer in Nigeria

Dr. Ayana,

Are you able to provide me with any context on the below and suggested response? Is this common to have conflicting views between someone's personal physician and Chevron Expat Medical?

If there is another resource you would suggest, could I please have their name?

Note that Mark finds this discriminatory in nature, however, this is hard to know with the limited information.

Kind Regards,
Andrew Powers

Sent from my iPhone
Begin forwarded message:

From: "Snookal, Mark" <Mark.Snookal@chevron.com>
Date: September 4, 2019 at 7:20:38 AM PDT
To: "Powers, Andrew C" <Andrew.Powers@chevron.com>
Cc: "Tse, Thalia" <thaliatse@chevron.com>, "Ruppert, Austin" <Austin.Ruppert@chevron.com>
Subject: Rescinded Job Offer in Nigeria

Andrew,

I am very disappointed in the decision by Chevron Medical to classify me as "unfit" for the Reliability Engineering Manager position at EGTL. I believe this decision was made based on a lack of understanding and stereotypical assumptions about my medical condition and is, therefore, discriminatory in nature. As my condition does not affect my ability to perform the job duties of that position, I require no ongoing care outside of annual monitoring, working in a remote location does not affect my condition, a complication from my condition would cause no harm to others, and I have no work restrictions from my physician this decision seems excessively paternalistic.

After the initial finding of "unfit," I appealed the decision, and Chevron Medical requested permission to contact the specialist who cares for me, and I agreed. That specialist sent an email to Chevron Medical, stating that my condition is stable and has been for three years and that the risk is "low." That same physician had earlier provided me with a letter stating that "it is safe for him [me] to work in Nigeria...His [my] condition is under good control, and no special treatment is needed." Which I provided to Chevron Medical before they made their initial determination of "unfit." Additionally, I passed all aspects of the regular examination, and the issue arises purely from a question about medical history.

Aside from my complaint of medical discrimination, where does their decision leave me? I spoke with the manager I would have reported to in Nigeria this morning, and they are rescinding the offer, but my position in El Segundo has already been filled.

Mark Snookal
IEA Reliability Team Lead

Chevron Products Company
El Segundo Refinery

324 W. El Segundo Blvd.
El Segundo, CA 90245
Tel 310.615.5208
Mobile 310.678.5914
Mark.Snookal@chevron.com

EXHIBIT 30

From: Plazuela, Ira Danica [Chevron][o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d4d6da04fec44afa8a58f3cbab16c23b-irau]
Sent: Fri 4/24/2020 5:16:58 AM (UTC)
To: EMPortal_DO_NOT_REPLY@chevron.com[EMPortal_DO_NOT_REPLY@chevron.com]; NMA - Expat Admin.[L9LEK168@chevron.com]; Isiocha, Chinyere (Chinyerelsiocha)[Chinyerelsiocha@chevron.com]; Okorodudu, Idongesit A. (IAIA)[IAIA@chevron.com]; Health & Medical Services - North and South America Expatriate Ex[EXAMAMER@chevron.com]; Health & Medical Services - Europe, Afr, Mid East, Eurasia Expat[EXAMEAME@chevron.com]; Immigration Group[immigr@chevron.com]; Mirabueno, Bijo Velante[JosephineMirabueno@chevron.com]; Jueves, Therese Nicole[ThereseNicole.Jueves@chevron.com]; Jueves, Therese Nicole[ThereseNicole.Jueves@chevron.com]
Subject: RE: Snookal,Mark - Escravos, Nigeria - Domestic to International Notification

Hi, All.

Please be advised that metadata below is cancelled due to assignment cancellation. Thank you.

Ira Plazuela ●●

Processing Representative - Global Mobility

iradanicaplazuela@chevron.com

CTN 793-7642

From: EMPortal_DO_NOT_REPLY@chevron.com <EMPortal_DO_NOT_REPLY@chevron.com>

Sent: Tuesday, July 9, 2019 3:51 PM

To: NMA - Expat Admin. <L9LEK168@chevron.com>; Isiocha, Chinyere (Chinyerelsiocha) <Chinyerelsiocha@chevron.com>; Okorodudu, Idongesit A. (IAIA) <IAIA@chevron.com>; Health & Medical Services - North and South America Expatriate Ex <EXAMAMER@chevron.com>; Health & Medical Services - Europe, Afr, Mid East, Eurasia Expat <EXAMEAME@chevron.com>; Immigration Group <immigr@chevron.com>; Mirabueno, Bijo Velante <JosephineMirabueno@chevron.com>; Jueves, Therese Nicole <ThereseNicole.Jueves@chevron.com>; Jueves, Therese Nicole <ThereseNicole.Jueves@chevron.com>

Subject: Snookal,Mark - Escravos, Nigeria - Domestic to International Notification

To Whom It May Concern,

This e-mail message is sent to you by Chevron Global Expatriate Administration Group. We would like to notify you about the new assignment acceptance with information in the table below.

ASSIGNEE INFORMATION	
Assignee Name (Last Name, First Name)	Snookal,Mark
Chevron-issued 4-Letter CAI	MVZM
Email	Mark.Snookal@chevron.com
Payroll	United States
Marital Status	Single
Host Family Size	1
Phone Number to Contact	+1 310-615-5208
Home Country	United States
Point of Origin	El Segundo, California
New Assignment Job Title	EGTL Reliability Engineering

Manager	
Home Personnel Number	70017136
New Hire	No
NEW ASSIGNMENT INFORMATION	
New Assignment	Rotational
New Assignment Country	Nigeria
New Assignment City/Work Location	Escravos
New Assignment Company	0811 - Chevron Upstream & Gas
New Assignment Cost Center	XCPR225000
New Assignment Supervisor Name	Okeowo, Siji
New Assignment Supervisor Email	siji.okeowo@chevron.com
Move Type:	Domestic to International
Anticipated Start Date	1 Jul 2019
Assignment Duration	3-4 years
Career Couple	No
Spouse's Name (Last Name, First Name)	
CURRENT ASSIGNMENT INFORMATION	
Current Assignment	Domestic
Current Host City/Work Location	El Segundo, United States
Current Assignment Company	0061 - Chevron Products Company
Current Assignment Cost Center	DCRES00758
OTHER CONTACTS	
HR Assignee Counselor Name (Last Name, First Name)	Mirabueno, Bijo
HR Assignee Counselor Email	JosephineMirabueno@chevron.com
Home-Country HR Contact Name	Andrews, Kelly
Home-Country HR Contact	KellyAndrews@chevron.com

Email

Home-Country HR Contact
Phone +1 310-615-5468New Assignment HR Contact
Name Ajayi, NwamakaNew Assignment HR Contact
Email NwamakaAjayi@chevron.comNew Assignment HR Contact
Phone +234 3660000X68122

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Email: expatjob@chevron.com

EXHIBIT 31

From: Levy, Scott[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EF6C6DC5AA0B407FA6A60ED694E3A3D1-LTMV]
Sent: Mon 8/26/2019 2:54:39 PM (UTC)
To: Arenyeka, Paul O. (PaulArenyeka)[PaulArenyeka@chevron.com]
Cc: Frangos MD, Steve (SAFR)[SAFR@chevron.com]
Subject: Re: **[**EXTERNAL**]** Patient MS

I support your decision and appreciate the rereview.
Scott

Sent from my iPhone

On 26 Aug 2019, at 15:51, Arenyeka, Paul O. (PaulArenyeka) <PaulArenyeka@chevron.com> wrote:

Dear Scott

Thank you for making the effort to engage the specialist in this case and I understand his opinion and recommendations.

However I believe we should still be very cautious. Based on recent developments around increasing medical evacuation from the field there is heightened focus on FFD in field locations by management. The risk of an incident no matter how low is a major factor in Escravos medical care. The logistics of getting an emergency out of Escravos especially when there is weather challenge compounds the risk of an adverse outcome.

I would be cautious about this and maintain our current decision. I discussed this case in view of its impending appeal with the HR & Medical leadership team this morning and the general feeling is that we should maintain the restriction based on the issues already outlined.

I will appreciate your guidance

Best Regards

Paul Arenyeka MD

Medical Director
Nigeria Mid Africa SBU
✉ poar@chevron.com
☎ CTN 2772222 ext 67046
☎ International + (234) -1-3667046

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From: Levy, Scott <ScottLevy@chevron.com>
Sent: Saturday, August 24, 2019 8:00 AM
To: Arenyeka, Paul O. (PaulArenyeka) <PaulArenyeka@chevron.com>
Cc: Frangos MD, Steve (SAFR) <SAFR@chevron.com>
Subject: Fwd: **[**EXTERNAL**]** Patient MS

Paul,

I had a conversation with Mark Snookals nephrologist and the info is below. Although not without some risk, I don't think we're dealing with high risk. We can mandate yearly clearance and report from nephrologist on yearly basis. Risk is even lower when we consider that he'll be a rotator.

Scott

Sent from my iPhone

Begin forwarded message:

From: "Steven H. Khan" <Steven.S.Khan@kp.org>
Date: 23 August 2019 at 22:35:33 BST
To: "scottlevy@chevron.com" <scottlevy@chevron.com>
Cc: "mark@maygus.com" <mark@maygus.com>
Subject: **[**EXTERNAL**] Patient MS**

Hi Dr. Levy,

I received your voicemail about Mr. MS who is a Chevron employee and my patient here at Kaiser.

I understand he is applying for a job in a rural or remote area of Nigeria and I understand the concern about his aortic aneurysm.

I just spoke to Mr. MS and received his permission to email you back. I am also copying him on this email.

Mr. MS's aneurysm is relatively small and considered low risk. His Thoracic aortic aneurysm size is 4.1-4.2 cm on his most recent CT scan.
From the published studies, the risk of rupture or dissection is 2% per year for aneurysms between 4.0 and 4.5 cm (Ann Thor Surg 2002 Vol 73, pg 17-28, figure 3).

Further, the average rate of growth of thoracic aortic aneurysms is 0.1%/year and Mr. MS's aneurysm has not changed between his CTs in May 2016, May 2017, and April 2019.

Since Mr. Snookal's aneurysm has not shown any growth for 3 years, his risk may be lower than the published 2% number above which would be based on "average" growth rates.

Finally, the studies of risk of rupture are fairly old (2002) and treatment has improved as has our understanding of aortic aneurysms.

For example, animal studies have shown a significant benefit from use of Angiotensin Receptor Blockers (ARB) in preventing or even reversing aortic aneurysm growth and Mr MS

Is on an ARB.

In summary, Mr. MS's risk of serious complications related to his thoracic aortic aneurysm is low and likely less than 2% per year.

The risk is primarily related to further enlargement of the aneurysm which can be tracked with an annual CT scan.

If you have any further questions, please feel free to email me or call me.

Best regards,

S. Khan, MD

Clinical Associate Professor, UCLA School of Medicine

Heart Failure and Transplant Cardiology, Kaiser Permanente

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EXHIBIT 32

From: Levy, Scott[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EF6C6DC5AA0B407FA6A60ED694E3A3D1-LTMV]
Sent: Tue 8/20/2019 4:05:53 PM (UTC)
To: Frangos MD, Steve (SAFR)[SAFR@chevron.com]
Cc: Arenyeka, Paul O. (PaulArenyeka)[PaulArenyeka@chevron.com]
Subject: Re: Nigeria Medical Determination

Got it. Thanks.

Sent from my iPhone

On 20 Aug 2019, at 17:31, Frangos MD, Steve (SAFR) <SAFR@chevron.com> wrote:

Scott / Paul: the employee reached me Friday evening, through guidance from another employee. I shared with him what Paul and I had determined in our review of the case: that he was deemed not fit for assignment in Escravos because of the location; but would have been fit if assignment was to Lagos.

He said he planned to appeal the medical clearance decision.

Stephen Frangos, MD, MPH, FACOEM

Regional Manager, Health and Medical – Americas

TR & HM COE

safr@chevron.com

Chevron Services Company

A Division of Chevron U.S.A. Inc.

Global Health and Medical

1400 Smith, Room 03016

Houston, Texas 77002

Tel +1 713 372 5922

Fax +1 713 372 5941

Mobile [REDACTED]

Chevron Malaria Hotline for any questions about symptoms or treatment- +1 866 276 5118

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From: Levy, Scott <ScottLevy@chevron.com>
Sent: Tuesday, August 20, 2019 8:44 AM
To: Arenyeka, Paul O. (PaulArenyeka) <PaulArenyeka@chevron.com>
Cc: Frangos MD, Steve (SAFR) <SAFR@chevron.com>
Subject: RE: Nigeria Medical Determination

Understood. Does he know this?

Scott Levy

Regional Medical Manager, Europe, Eurasia, Middle East & Africa

Chevron Products UK Limited

1 Westferry Circus

Canary Wharf

London E14 4HA
Office- +44 (0) 207 719 3390 (Also serves 24/7 medical emergency support)
Fax- +44 (0) 207 719 5188
Mobile- [REDACTED]
CTN- (8) 584 3390
ScottLevy@chevron.com

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From: Arenyeka, Paul O. (PaulArenyeka)
Sent: 20 August 2019 11:58
To: Levy, Scott <ScottLevy@chevron.com>
Cc: Frangos MD, Steve (SAFR) <SAFR@chevron.com>
Subject: RE: Nigeria Medical Determination

Good morning Scott

He was deemed not fit for assignment in Escravos because of the location. He would have been fit if assignment was to Lagos. it is left for his team to consider re-assignment to Lagos if that is their decision

Best Regards

Paul Arenyeka MD

Medical Director
Nigeria Mid Africa SBU
✉ poar@chevron.com
☎ CTN 2772222 ext 67046
☎ International [REDACTED]

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From: Levy, Scott <ScottLevy@chevron.com>
Sent: Tuesday, August 20, 2019 8:27 AM
To: Frangos MD, Steve (SAFR) <SAFR@chevron.com>; Arenyeka, Paul O. (PaulArenyeka)

<PaulArenyeka@chevron.com>

Subject: FW: Nigeria Medical Determination

Just trying to find where we left this. Has anyone reviewed if assignment could be Lagos?

Scott Levy

Regional Medical Manager, Europe, Eurasia, Middle East & Africa

Chevron Products UK Limited

1 Westferry Circus

Canary Wharf

London E14 4HA

Office- +44 (0) 207 719 3390 (Also serves 24/7 medical emergency support)

Fax- +44 (0) 207 719 5188

Mobile- [REDACTED]

CTN- (8) 584 3390

ScottLevy@chevron.com

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From: Cortina, Yvette

Sent: 19 August 2019 23:13

To: Levy, Scott <ScottLevy@chevron.com>

Cc: Snookal, Mark <Mark.Snookal@chevron.com>

Subject: FW: Nigeria Medical Determination

Hello Dr. Levy,

Mr. Mark Snookal (MVZM) reached out to me last week in regards to his Expatriate Assignment Recommendation. He was recently deemed "Not Fit" for assignment and would like to appeal this decision. Initial Assignment offer is Rotational to Escravos, Nigeria.

He has not received his medical results.

Thank you!

Regards,

Yvette Cortina | Administrative Assistant, Expatriate Health Services | 713-372-5926 |
yvette.cortina@chevron.com

From: Snookal, Mark <Mark.Snookal@chevron.com>

Sent: Monday, August 19, 2019 9:30 AM

To: Cortina, Yvette <Yvette.Cortina@chevron.com>

Subject: Nigeria Medical Determination

Good morning Yvette,

I never heard from anyone from your group on Friday and am hoping to get in touch with someone soon. In the meantime, I would like to request the records used to make the “not fit” determination as is my right.

Thanks,

Mark Snookal
IEA Reliability Team Lead

Chevron Products Company

El Segundo Refinery
324 W. El Segundo Blvd.
El Segundo, CA 90245
Tel 310.615.5208
Mobile 310.678.5914
Mark.Snookal@chevron.com

EXHIBIT 33

From: Levy, Scott[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EF6C6DC5AA0B407FA6A60ED694E3A3D1-LTMV]
Sent: Tue 8/27/2019 10:13:58 AM (UTC)
To: Seca Torres, Eldyleida[eldyleidasecatorres@chevron.com]
Subject: Re: Msea

Disregard.

Sent from my iPhone

> On 27 Aug 2019, at 11:02, Seca Torres, Eldyleida <eldyleidasecatorres@chevron.com> wrote:

>

> Should I request that the clearance given be placed on hold?

>

>

> -----Original Message-----

> From: Levy, Scott <ScottLevy@chevron.com>

> Sent: Friday, August 23, 2019 5:14 PM

> To: Seca Torres, Eldyleida <eldyleidasecatorres@chevron.com>

> Subject: Msea

>

>

> I don't know who the msea advisor is for Mark Snookal but can you inform them that we're reviewing his msea eval for escravos. This was previous sent as not ffd but I'm performing a second review.

>

> Thanks,

>

> Scott

> Sent from my iPhone

EXHIBIT 34

From: Levy, Scott[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EF6C6DC5AA0B407FA6A60ED694E3A3D1-LTMV]
Sent: Mon 8/26/2019 7:51:00 AM (UTC)
To: Steven H. Khan[Steven.S.Khan@kp.org]
Cc: Mark Snookal[Mark@maygus.com]
Subject: Re: **[**EXTERNAL**]** Patient MS

Dr. Khan,
Thank you for the very quick response. I'm working with my team in Nigeria right now to discuss.

Scott

Sent from my iPad

On Aug 23, 2019, at 10:35 PM, Steven H. Khan <Steven.S.Khan@kp.org> wrote:

Hi Dr. Levy,
I received your voicemail about Mr. MS who is a Chevron employee and my patient here at Kaiser. I understand he is applying for a job in a rural or remote area of Nigeria and I understand the concern about his aortic aneurysm.

I just spoke to Mr. MS and received his permission to email you back. I am also copying him on this email.

Mr. MS's aneurysm is relatively small and considered low risk. His Thoracic aortic aneurysm size is 4.1-4.2 cm on his most recent CT scan.

From the published studies, the risk of rupture or dissection is 2% per year for aneurysms between 4.0 and 4.5 cm (Ann Thor Surg 2002 Vol 73, pg 17-28, figure 3).

Further, the average rate of growth of thoracic aortic aneurysms is 0.1%/year and Mr. MS's aneurysm has not changed between his CTs in May 2016, May 2017, and April 2019.

Since Mr. Snookal's aneurysm has not shown any growth for 3 years, his risk may be lower than the published 2% number above which would be based on "average" growth rates.

Finally, the studies of risk of rupture are fairly old (2002) and treatment has improved as has our understanding of aortic aneurysms.

For example, animal studies have shown a significant benefit from use of Angiotensin Receptor Blockers (ARB) in preventing or even reversing aortic aneurysm growth and Mr MS is on an ARB.

In summary, Mr. MS's risk of serious complications related to his thoracic aortic aneurysm is low and likely less than 2% per year.

The risk is primarily related to further enlargement of the aneurysm which can be tracked with an annual CT scan.

If you have any further questions, please feel free to email me or call me.

Best regards,

S. Khan, MD

Clinical Associate Professor, UCLA School of Medicine
Heart Failure and Transplant Cardiology, Kaiser Permanente

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EXHIBIT 35

From: Snookal, Mark[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=055D9094D3E242128BEF80F5C6B3DAD9-MVZM]
Sent: Thur 9/5/2019 11:56:01 PM (UTC)
To: Cortina, Yvette[Yvette.Cortina@chevron.com]
Subject: RE: Nigeria Medical Determination

Yvette,

I have spoken to Dr. Levy about the determination, but I would still like to have a copy of the paperwork and results used to make the determination.

Thank You

Mark Snookal
IEA Reliability Team Lead

Chevron Products Company

El Segundo Refinery
Tel 310.615.5208
Mobile 310.678.5914

From: Cortina, Yvette <Yvette.Cortina@chevron.com>
Sent: Monday, August 19, 2019 3:13 PM
To: Levy, Scott <ScottLevy@chevron.com>
Cc: Snookal, Mark <Mark.Snookal@chevron.com>
Subject: FW: Nigeria Medical Determination

Hello Dr. Levy,

Mr. Mark Snookal (MVZM) reached out to me last week in regards to his Expatriate Assignment Recommendation. He was recently deemed "Not Fit" for assignment and would like to appeal this decision. Initial Assignment offer is Rotational to Escravos, Nigeria.

He has not received his medical results.

Thank you!

Regards,
Yvette Cortina | Administrative Assistant, Expatriate Health Services | 713-372-5926 |
yvette.cortina@chevron.com

From: Snookal, Mark <Mark.Snookal@chevron.com>
Sent: Monday, August 19, 2019 9:30 AM
To: Cortina, Yvette <Yvette.Cortina@chevron.com>
Subject: Nigeria Medical Determination

Good morning Yvette,

I never heard from anyone from your group on Friday and am hoping to get in touch with someone soon. In the meantime, I would like to request the records used to make the "not fit" determination as is my right.

EXHIBIT 36

From: Vang, Bao[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E5F73CF2E13A487F8014CA4E33650E84-BAVU]
Sent: Fri 6/7/2019 12:49:40 PM (UTC)
To: Omomehin, Andrew A. (AAOM)[aaom@chevron.com]
Cc: Ajayi, Nwamaka[NwamakaAjayi@chevron.com]; NIGEC EGTL Technical - Manager (L9ESC1596-smb)[L9esc1596@chevron.com]; FE - Sponsor Group[fespogrp@chevron.com]
Subject: RE: EGTL RE Manager Posting - Global PDC

Hi Andrew,

The candidate summary table is not fully filled out. Please complete rankings in the following areas for all shortlisted candidates as they are currently blank and also note the selected candidate in the file in the last column. This is required for record purposes and as it appears at least one of the categories below is a differentiating factor, I'd like to ensure we clearly communicate this to the candidate's PDRs when seeking concurrence.

CSOC Focus	Demonstrated Chevron Way Behavior	Development Fit	Operational Excellence	Selected Candidate
------------	-----------------------------------	-----------------	------------------------	--------------------

Thanks.
 Bao

From: Omomehin, Andrew A. (AAOM)
Sent: Thursday, June 6, 2019 11:28 AM
To: FE - Sponsor Group <fespogrp@chevron.com>
Cc: Vang, Bao <BaoVang@chevron.com>; Ajayi, Nwamaka <NwamakaAjayi@chevron.com>; NIGEC EGTL Technical - Manager (L9ESC1596-smb) <L9esc1596@chevron.com>
Subject: FW: EGTL RE Manager Posting - Global PDC

Please See attached ranking of the candidates for the NMA EGTL Reliability Engineering Manager position for your use. We are recommending Mark Snookal for the position.

Regards,
 Andrew

From: NIGEC EGTL Technical - Manager (L9ESC1596-smb)
Sent: Tuesday, June 4, 2019 10:36 AM
To: Omomehin, Andrew A. (AAOM) <aaom@chevron.com>; Ajayi, Nwamaka <NwamakaAjayi@chevron.com>
Subject: EGTL RE Manager Posting - Global PDC

Amaka, Andrew:

We finished the ranking of the candidates this morning. Here is a summary of the results...

	20%	30%	30%	20%	Total
					
Amir Zaheer	4	4	3	3	3.5

Mark Snookal

4

3

3

4

3.4

We saw Amir and Mark essentially tied based on the criteria and weighting. We think the development fit was much better for Mark Snookal and used that criteria as the tie breaker. The VGM (Greg Gabel / Mike Charlton) and the existing Reliability Manager (Chander Sanbhi) participated on the scoring and ranking of the candidates.

Thanks,

Kent DeBoer – Technical Manager
(B2B – Siji Okeowo)
Escravos Gas to Liquids (EGTL)
Chevron Nigeria Limited
Office: +234 (0) 1 367 6877
Office U.S. Tie-Line: (925) 842 1111 option 4 x6877
Office CTN: 367 6877
Nigeria Mobile: [REDACTED]
kdeboer@chevron.com
l9esc1596@chevron.com (shared email with B2B)

From: FE - Sponsor Group
Sent: Tuesday, May 21, 2019 10:07 AM
To: Omomehin, Andrew A. (AAOM) <aaom@chevron.com>
Cc: Vang, Bao <BaoVang@chevron.com>
Subject: NMA Job Closed 5/20

Hi Andrew,

The following job for **NMA** closed on 05/20, **401333**. You will find the candidate summary table in SharePoint-
[2H2019 Off-Cycle](#) under **Job Slates**.

Regards,

Marion Gerard
Sponsor Support Specialist
mariongerard@chevron.com

Chevron Services Company
HR Shared Services
1400 Smith Street, 09040
Houston, TX 77002
+1 713 372 8070

From: Omomehin, Andrew A. (AAOM)[aaom@chevron.com]
Sent: Thur 6/6/2019 4:27:35 PM (UTC)
To: FE - Sponsor Group[fespogrp@chevron.com]
Cc: Vang, Bao[BaoVang@chevron.com]; Ajayi, Nwamaka[NwamakaAjayi@chevron.com]; NIGEC EGTL Technical - Manager (L9ESC1596-smb)[L9esc1596@chevron.com]
Subject: FW: EGTL RE Manager Posting - Global PDC
Attachment: 401333_Candidate Summary NMA EGTL Reliability Engrg Mgr.xlsx
Attachment: EGTL Reliability Engineering Manager_v- OJ1.xlsx



Please See attached ranking of the candidates for the NMA EGTL Reliability Engineering Manager position for your use. We are recommending Mark Snookal for the position.

Regards,
 Andrew

From: NIGEC EGTL Technical - Manager (L9ESC1596-smb)
Sent: Tuesday, June 4, 2019 10:36 AM
To: Omomehin, Andrew A. (AAOM) <aaom@chevron.com>; Ajayi, Nwamaka <NwamakaAjayi@chevron.com>
Subject: EGTL RE Manager Posting - Global PDC

Amaka, Andrew:

We finished the ranking of the candidates this morning. Here is a summary of the results...

	20%	30%	30%	20%	Total
					
Amir Zaheer	4	4	3	3	3.5
Mark Snookal	4	3	3	4	3.4

We saw Amir and Mark essentially tied based on the criteria and weighting. We think the development fit was much better for Mark Snookal and used that criteria as the tie breaker. The VGM (Greg Gabel / Mike Charlton) and the existing Reliability Manager (Chander Sanbhi) participated on the scoring and ranking of the candidates.

Thanks,

Kent DeBoer – Technical Manager
 (B2B – Siji Okeowo)
 Escravos Gas to Liquids (EGTL)
 Chevron Nigeria Limited
 Office: +234 (0) 1 367 6877
 Office U.S. Tie-Line: (925) 842 1111 option 4 x6877
 Office CTN: 367 6877

Nigeria Mobile: [REDACTED]

kdeboer@chevron.com

l9esc1596@chevron.com (shared email with B2B)

From: FE - Sponsor Group

Sent: Tuesday, May 21, 2019 10:07 AM

To: Omomehin, Andrew A. (AAOM) <aaom@chevron.com>

Cc: Vang, Bao <BaoVang@chevron.com>

Subject: NMA Job Closed 5/20

Hi Andrew,

The following job for **NMA** closed on 05/20, **401333**. You will find the candidate summary table in SharePoint-
[2H2019 Off-Cycle](#) under **Job Slates**.

Regards,

Marion Gerard

Sponsor Support Specialist

mariongerard@chevron.com

Chevron Services Company

HR Shared Services

1400 Smith Street, 09040

Houston, TX 77002

+1 [REDACTED]

EXHIBIT 37

Summary of Cardiology Opinions – NMA Cardiologists

Request

Kindly help evaluated medical documents and attached Cardiologist report for above named EE who is coming to Escravos from the USA. His job description is- Reliability Engineering Manager.

Kindly review around the following key points:

1. Potential complications and the likelihood of progression
2. Management of these complications even if only initial intervention vis-à-vis available care level in Escravos
3. Possible instructions to communicate to employee as per preventing complications.

Responses

Dr Aiwuyo (EGTL)

Good day,

With regards to this expert, 47years old employee with CT and ultrasound evidence of Thoracic aortic aneurysm,

It was documented in the report that he has aortic dilatation of 4.4cm on ECHCARDIOGRAPHY,

however CT aortography which is a more accurate imaging modality revealed a maximum value of 4.2cm max at the aortic root and 4.1cm max at the descending thoracic aorta.

From the Canadian guidelines these values appear low risk for a major adverse CV event. Some have used values of <4.5cm as partition value for low risk situations., link below refers.

[HYPERLINK "<https://www.ucalgary.ca/FTWguidelines/content/aortic-aneurysm>"]

it is expected that every aneurysm must be subjected to 6months- 1year assessment to ascertain the rate of progression (>1cm is an indication for repair). I feel there should be a concrete plan by his home cardiologist for this evaluation.

Below are my response to the questions put forward:

1. Complications associated with aneurysms include
 - a. Rupture/dissection (sudden and catastrophic) and its attendant sequela
 - b. Thromboembolic phenomenon
 - c. Pressure symptoms on other vital organs
 - d. Sudden death
2. In Escravos unfortunately we are only limited to initial stabilization and transfer of such high risk CV complications if any occurs. In the unlikely event of any of the aforementioned complications, we may not be able to support such an individual due to our peculiarities.

3. Instructions for the patient

- avoid lifting heavy objects
- quit smoking (if he is a smoker)
- manage hypertension strictly, there is need to aim for lower targets <120mmhg systolic (DOC beta blockers)
- watch out for alarm symptoms like pain in the chest (throbbing, tearing, aching or sharp pain, often sudden), pain in the back, nausea, vomiting, fainting, and systemic shock
- avoid moderate to high intensity exercises as much as possible

I made effort to search the MEP if there are clear cut field guidelines for patient with aortic aneurysm, unfortunately I found none. What is established is that a patient with symptomatic aneurysm should not be allowed to work in an offshore location.

I am still open to further discussions on this.

Dr Adeyeye

I agree with Dr Aiwuyo submissions on above employee, especially the precautionary measures highlighted which we need to further reiterate to our client.

I have a little concern about his choice of anti-hypertensives (Losartan and Amlodipine). Guideline-directed management recommends Beta-blockers like Carvedilol, Bisoprolol as part of his blood pressure control meds with a systolic BP target of less than 120mmHg (Thoracic aortic aneurysm and documented runs of premature ventricular complexes). It will be nice if this is brought to the attention of his physician.

Dr Akintunde

I concur with my colleagues. With an aortic root of 4.2cm, he is 'low risk' but not 'no risk'.

I would however be more comfortable if he were on a beta-blocker as one of his meds or in addition to current meds. The fact that he does not smoke cigarettes is beneficial. There could be a reason his cardiologist did not put him on a beta-blocker. Could he have a contraindication such as asthma, COPD or allergy? Is there a medical report from his cardiologist? I only see imaging reports.

Dr Asekomeh's response to Dr Akintunde

Below is response from Dr. Akintunde. I have given her update on the Cardiologist report. I also engaged her on the pulse rate and we agreed on the fact that this could signify either the employee is already on a beta blocker and did not mention it on his form GO-146 or this is the reason why he is not on the beta blocker.

From: Pitan, Olorunfemi (femi.pitan)[femi.pitan@chevron.com]
Sent: Thur 8/15/2019 8:15:07 AM (UTC)
To: ADEYEYE, VICTOR [DELOG MEDICAL SERVICES][DNOY@chevron.com]; Aiwuyo, Henry [SERVITICO][henryaiwuyo@chevron.com]; Asekomeh, Eshiofe [DELOG][EAEV@chevron.com]
Cc: NIGEC Staff Physicians (l9esc300)[L9ESC300@chevron.com]
Subject: RE: Snookal, Mark- Medical report

Good day sirs,

Thanks for your very valuable and comprehensive input into this case. Your opinions were communicated to the Physicians in the U.S.

It has been decided that Mark Snookal is not a suitable candidate to work in Escravos. He will be considered for an assignment in Lagos.

Kind regards,
Femi Pitan

Dr O.C. Pitan
OH Physician/ Head, Occupational Health
Nigeria Mid Africa Strategic Business Unit
✉ femi.pitan@Chevron.com
☎ CTN 2772222 ext 61807
☎ International [REDACTED]

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From: ADEYEYE, VICTOR [DELOG MEDICAL SERVICES] <DNOY@chevron.com>
Sent: Monday, August 5, 2019 5:55 PM
To: Aiwuyo, Henry [SERVITICO] <henryaiwuyo@chevron.com>; Asekomeh, Eshiofe [DELOG] <EAEV@chevron.com>
Cc: Pitan, Olorunfemi (femi.pitan) <femi.pitan@chevron.com>
Subject: RE: Snookal, Mark- Medical report

Sir/Ma,

I agree with Dr Aiwuyo submissions on above employee, especially the precautionary measures highlighted which we need to further reiterate to our client.

I have a little concern about his choice of anti-hypertensives (Losartan and Amlodipine). Guideline-directed management recommends Beta-blockers like Carvedilol, Bisoprolol as part of his blood pressure control meds with a systolic BP target of less than 120mmHg (Thoracic aortic aneurysm and documented runs of premature ventricular complexes).

It will be nice if this is brought to the attention of his physician.

Kind regards,

Victor.

From: Aiwuyo, Henry [SERVITICO] <henryaiwuyo@chevron.com>

Sent: Monday, August 5, 2019 2:26 PM

To: Asekomeh, Eshiofe [DELOG] <EAEV@chevron.com>; ADEYEYE, VICTOR [DELOG MEDICAL SERVICES] <DNOY@chevron.com>

Cc: Pitan, Olorunfemi (femi.pitan) <femi.pitan@chevron.com>

Subject: RE: Snookal, Mark- Medical report

Good day,

With regards to this expert, 47years old employee with CT and ultrasound evidence of Thoracic aortic aneurysm,

It was documented in the report that he has aortic dilatation of 4.4cm on ECHCARDIOGRAPHY,

however CT aortography which is a more accurate imaging modality revealed a maximum value of 4.2cm max at the aortic root and 4.1cm max at the descending thoracic aorta.

From the Canadian guidelines these values appear low risk for a major adverse CV event. Some have used values of <4.5cm as partition value for low risk situations., link below refers.

<https://www.ucalgary.ca/FTWguidelines/content/aortic-aneurysm>

it is expected that every aneurysm must be subjected to 6months- 1year assessment to ascertain the rate of progression (>1cm is an indication for repair). I feel there should be a concrete plan by his home cardiologist for this

evaluation.

Below are my response to the questions put forward:

1. Complications associated with aneurysms include

- a. Rupture/dissection (sudden and catastrophic) and its attendant sequela
- b. Thromboembolic phenomenon
- c. Pressure symptoms on other vital organs
- d. Sudden death

2. In Escravos unfortunately we are only limited to initial stabilization and transfer of such high risk CV complications if any occurs. In the unlikely event of any of the aforementioned complications, we may not be able to support

such an individual due to our peculiarities.

3. Instructions for the patient

- avoid lifting heavy objects
- quit smoking (if he is a smoker)
- manage hypertension strictly, there is need to aim for lower targets <120mmhg systolic (DOC beta blockers)

-watch out for alarm symptoms like pain in the chest (throbbing, tearing, aching or sharp pain, often sudden), pain in the back, nausea, vomiting, fainting, and systemic shock

-avoid moderate to high intensity exercises as much as possible

I made effort to search the MEP if there are clear cut field guidelines for patient with aortic aneurysm, unfortunately I found none. What is established is that a patient with symptomatic aneurysm should not be allowed to work in an offshore location.

I am still open to further discussions on this sir.

Warm regards.

DR. AIWUYO, HENRY

OH Physician/Cardiologist

EGTL clinic

EXT-77943

B2B dr oyebowale olaniyi

"as to diseases, make a habit of two things- to help, or at least, to do no harm"

hippocrates

From: Asekomeh, Eshiofe [DELOG] <EAEV@chevron.com>

Sent: Monday, August 5, 2019 11:43 AM

To: ADEYEYE, VICTOR [DELOG MEDICAL SERVICES] <DNOY@chevron.com>

Cc: Aiwuyo, Henry [SERVITICO] <henryaiwuyo@chevron.com>; Pitan, Olorunfemi (femi.pitan) <femi.pitan@chevron.com>

Subject: FW: Snookal, Mark- Medical report

Good day,

Below mail trail refers. Kindly help evaluated medical documents and attached Cardiologist report for above named EE who is coming to Escravos from the USA. His job description is- Reliability Engineering Manager.

Kindly review around the following key points:

1. Potential complications and the likelihood of progression
2. Management of these complications even if only initial intervention vis-à-vis available care level in Escravos
3. Possible instructions to communicate to employee as per preventing complications.

Thanks for your usual help.

Warm regards,

Eshiofe Asekomeh

From: Asekomeh, Eshiofe [DELOG]
Sent: Tuesday, July 30, 2019 7:44 PM
To: Pitan, Olorunfemi (femi.pitan) <femi.pitan@chevron.com>
Cc: NIGEC Staff Physicians (I9esc300) <L9ESC300@chevron.com>
Subject: Snookal, Mark- Medical report

Good day Ma,

I will like to discuss Mark Snookal (Manager, Reliability Engineering) with you tomorrow. He is on transfer from EI Segundo, USA to Escravos, Nigeria on international assignment. He has aortic root dilatation and was reviewed by a Cardiologist April this year. The examining Physician in the US had declared him fit with limitation (not to lift weight above 50 pounds). Attached are the medical reports and the Cardiologist report from April, 2019.

Warm regards,

Eshiofe Asekomeh

Dr. Asekomeh E.G
Chevron Hospital
Warri, Nigeria

EXHIBIT 38

From: Pitán, Olorunfemi (femi.pitan)[femi.pitan@chevron.com]
Sent: Wed 8/7/2019 3:20:05 PM (UTC)
To: Asekomeh, Eshiofe [DELOG][EAEV@chevron.com]
Subject: RE: Medical summary - Snookal, Mark

Thanks for the follow-up and updates.

From: Asekomeh, Eshiofe [DELOG] <EAEV@chevron.com>
Sent: Wednesday, August 7, 2019 3:17 PM
To: Pitán, Olorunfemi (femi.pitan) <femi.pitan@chevron.com>
Subject: RE: Medical summary - Snookal, Mark

Good day Ma,

Unfortunately Dr. Aiwuyo is unable to get any other literature on risk stratification aside from the one he already referenced (Canadian).
Literature on risk of complications post- surgery exist but is not relevant here. I hinted Dr. Akintunde on the urgency of the review and she promised to review the case possibly today.
I have not been able to catch her on phone today. I am still hopeful she will revert back before the end of the day. I will keep trying to reach her.

Warm regards,

Eshiofe Asekomeh

From: Pitán, Olorunfemi (femi.pitan) <femi.pitan@chevron.com>
Sent: Wednesday, August 7, 2019 1:41 PM
To: Asekomeh, Eshiofe [DELOG] <EAEV@chevron.com>
Subject: RE: Medical summary - Snookal, Mark

Excellent summary! Thanks a million.

- Is Dr Aiwuyo (or Dr Oyebowale) able to do a further risk stratification, based on percentage likelihood of occurrence of each complication in this client?
- When should I expect Dr Akintunde's review?

I totally appreciate all your help.

Kind regards,
Femi Pitán

Dr O.C. Pitán
OH Physician/ Head, Occupational Health
Nigeria Mid Africa Strategic Business Unit
✉ femi.pitan@Chevron.com
☎ CTN 2772222 ext 61807

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From: Asekomeh, Eshiofe [DELOG] <EAEV@chevron.com>
Sent: Wednesday, August 7, 2019 1:31 PM
To: Pitan, Olorunfemi (femi.pitan) <femi.pitan@chevron.com>
Subject: Medical summary - Snookal, Mark

Good day Ma,

Please find attached, medical summary for above named employee as requested.
Also attached, are the recent Cardiologist clearance and the CTA/ Echo reports from April.

Warm regards,

Eshiofe Asekomeh

Dr. Asekomeh E.G
Chevron Hospital
Warri, Nigeria

EXHIBIT 39



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**Stephen Frangos, MD, MPH, FACOEM** (He/Him)

Physician Expert in Occupational Health, Environmental Health and Public Health



- Baker Hughes

Santa Barbara, California, United States • [Contact info](#)

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Stephen Frangos, MD, MPH, FACOEM commented on a post • 3d

Dear Rhonda, your post and your words struck a definite cord with me. I appreciate how easily you are able to share your feelings and impart your wisdom to friends and colleagues. I wish you a very best of things and good health to enjoy them. Dr. Steve

Stephen Frangos, MD, MPH, FACOEM commented on a post • 4d

Hi Robin. Wishing you the very best in your upcoming retirement and transition to what lies in front for you and your family.

Stephen Frangos, MD, MPH, FACOEM commented on a post • 6d

Congrats Chase! Go get 'em!

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Baker Hughes · Full-time

Dec 2022 - Present · 2 yrs

Santa Barbara, California, United States · Remote

I am pleased to announce that I have been hired by Baker Hughes to serve their employees and business operations as their Global Medical Director. This is an exciting opportunity and I look forward to continuing my friendship and affiliation with colleagues in the oil and gas industries.

**Chevron**

30 yrs 11 mos

Regional Medical Manager for North and South America Operations

Aug 1999 - Jun 2022 · 22 yrs 11 mos

Physician expert in Occupational Health, Environmental Health and Public Health. Responsible for the development and implementation of Occupational Health services for business operations with more than 25,000 employees, including oversight of ten occupational health clinics and 6,000 employees enrolled in medical surveillance programs.

Staff Physician

Aug 1991 - Aug 1999 · 8 yrs 1 mo

Cruise Ship Physician

Norwegian Cruise Line Holdings Ltd · Part-time

Aug 1989 - Jun 1991 · 1 yr 11 mos

Delivering high quality urgent care and emergency medical care to cruise ship passengers and crew members on multiple vessels in the Caribbean...



Aerospace Medicine Physician

United States Air Force · Full-time

Jun 1984 - Jul 1988 · 4 yrs 2 mos

Zaragoza, Aragon, Spain and RAF Lakenheath, England UK

Provided mission-essential Aerospace Medicine and Flight Surgeon medical support front-line fight squadrons and supporting tanker operat ...see more

Skills

Industrial Hygiene



Endorsed by 15 colleagues at Chevron



Endorsed by 1 person in the last 6 months



37 endorsements

Offshore Drilling



Endorsed by 4 colleagues at Chevron



Endorsed by 1 person in the last 6 months



9 endorsements

Show all 47 skills →

Recommendations

Received

Given



Wade Goldston

Purchasing Manager - Orbital Gas Systems

April 4, 2013, Wade worked with Stephen but they were at different companies

Steve is a rock solid dependable asset to whatever he makes an effort at. He genuinely cares about his work and always puts forth his best effort.

Interests

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Lorenzo Simonelli

Chairman & CEO at Baker Hughes

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Fernando Akio Mariya 
Medical Director for Latin America - South
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Thought Leader - Strategic Partner - Whole Health - Lifestyle Medicine -
Global Experience...

Message



Steven Ross MD, MPH · 3rd+
Senior/Enterprise Occupational Health Physician at Boeing

Message



Yogesh Reddy MD, MPH, MHA, FACOEM · 3rd+
VP Health Services

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Arch "Chip" Carson · 3rd+
Occupational/Environmental Medicine and Medical Toxicology

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Jayne (Koo) Cho  · 3rd+
Experiences Expert - Relationship Builder - Strategic Solutions | Creating
unforgettable corporate events for your clients | Ex-NBCU & Showtime

Message



Alan Zreczny  · 3rd+
Entrepreneur/CEO/COO/General Counsel/Small Business Specialist

Message

People you may know

From Stephen's company



Lucas Thoennes

Systems Engineer @ Baker Hughes | MCSE, IT Pro



Tomiris K.

Field Engineer I - LWD / DD at Baker Hughes



Gabriela Weretka

LATAM Lead specialist Finance en Baker Hughes



Pilar Alvarez Delgado

Global Service Leader at Baker Hughes



Mahmoud El Hemaly

Crew leader & technician .SRP.

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